

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 3:12 CR 0047
)	
DION LEVERING WILLIAMS, (4))	
)	
Defendant.)	

STATEMENT OF FACTS

If this matter were to proceed to trial, the Government would prove the following facts beyond a reasonable doubt:

1. Beginning in or about January 2012, and continuing through on or about January 27, 2012, in the Eastern District of Virginia and elsewhere, and within the jurisdiction of this court, defendant DION LEVERING WILLIAMS, did knowingly, intentionally, and unlawfully combine, conspire, confederate and agree with others, known and unknown to the United States Attorney, to possess with intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A). DION WILLIAMS agrees that he knowingly entered in this conspiracy and acted with the intention to further the unlawful purposes of the conspiracy and the offenses charged in count one of the pending indictment.

2. In or about late 2011, DION WILLIAMS contacted Hiram Alvarez about purchasing 100 kilograms of cocaine from Alvarez for a purchase price of approximately

\$2,500,000. Alvarez, in turn, contacted a cooperating source about supplying the cocaine to WILLIAMS.

3. On or about January 26, 2012, the cooperating source, another individual, and a third individual who was representing Alvarez in the proposed transaction flew from California to Richmond, Virginia. Once in Richmond, the three individuals rented a vehicle and drove to Owings Mills, Maryland. The following day, on January 27, 2012, WILLIAMS met the three individuals at a hotel in Owings Mills, Maryland. WILLIAMS directed the three individuals to a meeting place at an apartment in Owings Mills, Maryland. At the apartment, WILLIAMS and the three individuals made arrangements for the planned drug transaction.

4. On January 27, 2012, WILLIAMS gathered funds for the proposed drug transaction. In the evening on January 27, WILLIAMS again met with the three individuals to count the funds. WILLIAMS and others verified that WILLIAMS had gathered approximately \$1,500,000 in United States currency for the proposed transaction.

5. After verifying the funds, the cooperating source and two other individuals left the residence. Law enforcement executed a search warrant at the residence following their departure. During the search, WILLIAMS and two others were found in possession of approximately \$1,499,377.00 in United States currency, two Royal Sovereign money counters, two handguns, and other items. WILLIAMS was arrested following the search.

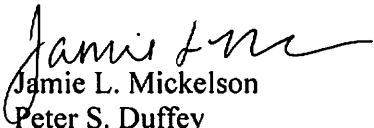
6. For relevant conduct purposes, WILLIAMS agrees that he conspired with others to possess with intent to distribute between 50 and 150 kilograms of cocaine, a schedule II controlled substance.

The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offense charged in this case nor does it identify all of the

persons with whom the defendant may have engaged in illegal activities.

Respectfully submitted,

Neil H. MacBride
United States Attorney

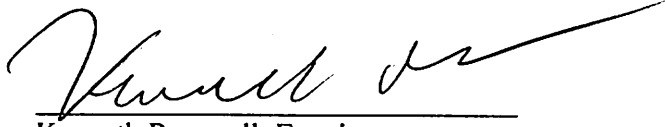
By: 
Jamie L. Mickelson
Peter S. Duffey
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Dion Levering Williams, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Dion L. Williams

I am Dion Levering Williams's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Kenneth Ravenell, Esquire
Attorney for Dion L. Williams